

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOGINDER SINGH,

Plaintiff,

-against-

TOPLINE NYC CONTRACTING INC.,
TOPLINE NYC INC., GURPREET SINGH, and
LAKHVINDER SINGH,

Defendants.

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Case No.: 1:25-cv-776 (NCN) (VMS)

**AFFIRMATION IN SUPPORT OF
PLAINTIFF’S REQUEST FOR
CERTIFICATE OF DEFAULT**

Emanuel Kataev, Esq., an attorney admitted to practice law before this Court, hereby respectfully declares as follows:

1. I am counsel for Plaintiff in this matter, and I am fully familiar with the facts herein.

2. I submit this declaration in support of Plaintiff’s request for entry for default.

3. This action was commenced on February 11, 2025, by the filing of the Complaint (ECF Docket Entry [1](#)), to recover compensatory and punitive damages, costs and attorneys’ fees for violations of violation of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962 (“RICO”); New York Labor Law (“NYLL”) whistleblower law, the Fair Labor Standards Act’s (“FLSA”) provisions concerning retaliation and unpaid overtime compensation, civil conspiracy, declaratory judgment, conversion, and unjust enrichment.

3. The time for defendants Topline NYC Contracting Inc., Topline NYC Inc., Gurpreet Singh and Lakhvinder Singh, to answer or otherwise move with respect to the complaint herein has expired.

4. Defendants Topline NYC Contracting Inc., Topline NYC Inc., Gurpreet Singh and Lakhvinder Singh, have not answered or otherwise moved with respect to the complaint, and the time for defendants to answer or otherwise move have not been extended.

5. That defendants Topline NYC Contracting Inc., Topline NYC Inc., Gurpreet Singh and Lakhvinder Singh are not infants or incompetent. Defendants are not presently in the military service of the United States as appears from facts in this litigation.

WHEREFORE, plaintiff Joginder Singh requests that the default of defendants be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

Dated: Jamaica, New York
March 18, 2025

Respectfully submitted,

SAGE LEGAL LLC

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